

MAGUIRE - 10/053,571  
Client/Matter: 012138-0290479

### REMARKS

Claims 25 and 29-38 are pending. Claims 30, 35 and 38 have been withdrawn from further consideration as being drawn to a non-elected species. By this Amendment, claims 25, 33 and 36 are amended. Reconsideration in view of the above amendments and following remarks is respectfully requested.

Applicant appreciates the courtesies extended by Examiner Ruddock to Applicant's representative during the personal interview conducted June 14, 2005. The points discussed during the interview are incorporated into the remarks below and constitute Applicant's record of the substance of the interview.

Claims 33, 34, 36 and 37 were rejected under 35 U.S.C. §102(b) over Sicard (U.S. Patent 3,674,154). The rejection is respectfully traversed.

Claim 33 recites a filter screen including, *inter alia*, a first plurality of filaments extending in a first direction and a second plurality of filaments extending in a second direction transverse to the first direction. The second plurality of filaments are woven with the first plurality of filaments. The filter screen also includes one or more first reinforcing filaments produced by brazing and engaged with the second plurality of filaments to reinforce the second plurality of filaments in the first direction, and one or more second reinforcing filaments produced by brazing and engaged with the first plurality of filaments to reinforce the first plurality of filaments in the second direction.

Sicard discloses, in Fig. 1, a filtration apparatus having a filtering member 10 that includes an inner screen 12 mechanically supported by an outer layer 14. The screen 12 and the layer 14 are bonded together by sintering or brazing (see col. 1, lines 60-65). As clearly disclosed by Sicard in col. 1, lines 64-65, the longitudinal seams are usually secured by welding.

Even assuming the outer layer 14 of Sicard were properly interpretable as the one or more first and second reinforcing filaments, as alleged by the Examiner, Sicard does not disclose that the outer layer 14 reinforces in a first direction and in a second direction transverse to the first direction, as recited in claim 33. As discussed above, Sicard discloses that the outer layer 14 and the screen 12 are secured by welding along longitudinal seams, i.e. in only one direction, not two directions. Accordingly, Sicard does not include every limitation of claim 33 and does not present a *prima facie* case of anticipation.

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Claim 34 recites additional features of the invention and is allowable for the same reasons discussed above with respect to claim 33 and for the additional features recited therein.

Claim 36 recites a filter screen including a first plurality of filaments extending in a first direction. A second plurality of filaments extend in a second direction transverse to the first direction. The second plurality of filaments are woven with the first plurality of filaments. One or more first reinforcing filaments are produced by welding and engaged with the second plurality of filaments to reinforce the second plurality of filaments in the first direction. One or more second reinforcing filaments are produced by welding and engaged with the first plurality of filaments to reinforce the first plurality of filaments in the second direction.

As discussed above, Sicard does not disclose reinforcing filaments extending in a first direction and a second direction transverse to the first direction. Sicard discloses seams in only one direction, the longitudinal direction. Therefore, Sicard does not include every limitation of claim 36 and does not present a *prima facie* case of anticipation.

Claim 37 recites additional features of the invention and is allowable for the same reasons discussed above with respect to claim 36 and for the additional features recited therein.

Reconsideration and withdrawal of the rejection of claims 33, 34, 36 and 37 under 35 U.S.C. § 102(b) over Sicard are respectfully requested.

Claims 25, 29 and 31 were rejected under 35 U.S.C. § 102(b) over Mutzenberg et al. (U.S. Patent 4,250,172) and claim 32 was rejected under 35 U.S.C. § 103(a) over Mutzenberg et al. in view of Sicard. The rejections are respectfully traversed.

Claim 25 recites a filter screen including a first plurality of filaments extending in a first direction. A second plurality of filaments extend in a second direction transverse to the first direction, the second plurality of filaments being woven with the first plurality of filaments. One or more first reinforcing filaments are woven with the second plurality of filaments to reinforce the second plurality of filaments in the first direction. One or more second reinforcing filaments are woven with the first plurality of filaments to reinforce the first plurality of filaments in the second direction.

Mutzenberg et al. disclose a needled fiber mat containing a granular agent. The layers V of textile fibers, part of which are unwoven, so that some of the fibers can be transported by needling through the layers S of granular agent and be interlocked to the other layers V.

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In other words, fibers from the upper layer V are interlocked by the penetrating needles with those of the intermediate and lower layers V at the opposite side of the mat. The needling operation is performed such that the seams N are in parallel rows at a distance A between the rows. As clearly shown in Fig. 2, the seams N extend in only one direction.

Even assuming it is proper to equate Mutzenberg et al.'s intertwinement of the fibers of the various layers to the claimed reinforcing filaments, as done by the Examiner on page 4, paragraph number 6, such an interpretation would not read on claim 25. As discussed above, Mutzenberg et al. only intertwine the fibers of the various layers in one direction, along the seams N. Mutzenberg et al. do not disclose reinforcing filaments in a first direction and a second direction transverse to the first direction, as recited in claim 25. Accordingly, Mutzenberg et al. does not include every limitation of claim 25 and does not present a *prima facie* case of anticipation.

With respect to claim 32, as neither Mutzenberg et al. nor Sicard disclose or suggest reinforcing filaments in a first direction and a second direction transverse to the first direction, the combination would fail to include all the limitations of claim 32 and would fail to present a *prima facie* case of obviousness.

Reconsideration and withdrawal of the rejections of claims 25, 29, 31 and 32 are respectfully requested.

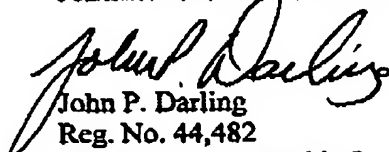
In view of the above amendments and remarks, Applicant respectfully submit that all of the claims, including withdrawn claims 30, 35 and 38, are allowable and that the entire application is in condition for allowance. Applicant respectfully requests rejoinder and allowance of the withdrawn claims.

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Should the Examiner believe anything further is desirable to place the application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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## **Addendum**

1. **PILLSBURY WINTHROP SHAW PITTMAN LLP**